



March 1, 2022

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The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

In accordance with Your Honor's instructions at the February 22, 2022 status conference, we write on behalf of the *Federal Insurance* plaintiffs concerning the lifting of the stay of judicial enforcement of the *Havlish* and *Doe* plaintiffs' writs of execution.

The *Federal Insurance* plaintiffs did not previously oppose the *Havlish* and *Doe* plaintiffs' motions to lift the stay,¹ and do not oppose the lifting of the stay now.

Respectfully submitted,

COZEN O'CONNOR

A handwritten signature in black ink, appearing to read "Sean P. Carter".

SEAN P. CARTER

¹ The Court appears to have understood the *Federal Insurance* plaintiffs' February 16, 2022 letter, ECF No. 7675, as joining in certain other plaintiffs' oppositions to lifting the stay. *See* Opinion and Order at ECF No. 7696 at p. 3 (referencing letters understood by the Court as opposing the lifting of the stay). The *Federal Insurance* plaintiffs' intent in their February 16, 2022 letter was simply to affirm the *Federal Insurance* plaintiffs' position concerning their 2007 motion for assessment of damages as to the Taliban, as set forth in their earlier December 22, 2021 letter, *see* ECF No. 7498, in light of the United States' Statement of Interest. The *Federal Insurance* plaintiffs apologize for not being more clear in their February 16, 2022 letter that they were not opposing the lifting of the stay.

The Honorable Sarah Netburn
March 1, 2022
Page 2

cc: All MDL Counsel of Record (via ECF)